

EXHIBIT A

In the Matter Of:

LYNNE FREEMAN vs

TRACY DEEBS-ELKENANEY

LYNNE FREEMAN

March 24, 2023



1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 Civil Action No. 1:22-cv-02435-LLS-SN

4 LYNNE FREEMAN, an individual,
5 Plaintiff,

6 -vs-

7 TRACY DEEBS-ELKENANEY P/K/A
8 TRACY WOLFF, an individual,
9 EMILY SYLVAN KIM, an
10 individual, PROSPECT AGENCY,
11 LLC, a New Jersey limited
12 liability company, ENTANGLED
13 PUBLISHING, LLC, a Delaware
14 limited liability company,
15 HOLTZBRINCK PUBLISHERS, LLC
16 D/B/A MACMILLAN, a New York
17 limited liability company, and
18 UNIVERSAL CITY STUDIOS, LLC, a
19 Delaware limited liability
20 company,

21 Defendants.

22 _____/
23
24 DEPOSITION OF
25 Lynne Freeman
CONFIDENTIAL - ATTORNEYS' EYES ONLY

Friday, March 24, 2023
9:04 a.m. - 6:19 p.m.
Pacific Time

Remote Location
Via Zoom Videoconference
All Parties Remote

STENOGRAPHICALLY REPORTED BY:
ERICA FIELD, RPR
JOB NO. 886198

1 APPEARANCES:

2
3
4 On behalf of the Plaintiff:
5 DONIGER BURROUGHS
6 603 Rose Avenue
7 Venice, California 90291
8 (310) 590-1820
9 BY: STEPHEN DONIGER, ESQUIRE
10 stephen@donigerlawfirm.com

11 On behalf of the Plaintiff:
12 CSREEDER
13 11766 Wilshire Boulevard
14 Suite 1470
15 Los Angeles, California 90025
16 (310) 861-2475
17 BY: MARK PASSIN, ESQUIRE
18 mark@csrlawyers.com

19 On behalf of Prospect Agency and Emily
20 Sylvan Kim:
21 KLARIS LAW
22 29 Little West 12th Street
23 New York, New York 10014
24 (917) 822-7468
25 BY: LANCE KOONCE, ESQUIRE
ZACHARY PRESS, ESQUIRE
lance.koonce@klarislaw.com
zach.press@klarislaw.com

1 APPEARANCES CONTINUED:

2
3
4 On behalf of Tracy Deebbs-Elkenaney p/k/a
5 Tracy Wolff, Entangled Publishing, LLC,
6 Holtzbrinck Publishers, LLC d/b/a Macmillan,
7 and Universal City Studios LLC:

8 COWAN, DEBAETS, ABRAHAMS & SHEPPARD

9 41 Madison Avenue

10 38th Floor

11 New York, New York 10010

12 (212) 974-7474

13 BY: NANCY WOLFF, ESQUIRE

14 CECE COLE, ESQUIRE

15 BENJAMIN HALPERIN, ESQUIRE

16 nwolff@cdas.com

17 ccole@cdas.com

18 bhalperin@cdas.com

19 ALSO PRESENT:

20 Tracy Wolff

21 Elizabeth Pelletier

22 VIDEOGRAPHER:

23 Adriel Olvera

24 Isaac Orihuela

1 Q. You mentioned that Mark Passin is
2 your attorney of record here as well?

3 A. Correct.

4 Q. How do you pay Mark Passin?

5 THE WITNESS: I assume I'm able
6 to answer these questions, Stephen?

7 MR. DONIGER: You can say the
8 nature of the --

9 THE WITNESS: Okay.

10 A. [REDACTED]

11 BY MS. COLE:

12 Q. And what about Paul LiCalsi's
13 firm? How is he being paid?

14 A. [REDACTED]

15 [REDACTED]

16 Q. And you recently retained Doniger
17 Burroughs as counsel of record; isn't that
18 true?

19 A. Correct.

20 Q. How is Doniger Burroughs being
21 compensated here?

22 A. [REDACTED]

23 MS. COLE: I have no further
24 questions on my end.

25 If we want to take a break, or

CERTIFICATE OF REPORTER

UNITED STATES DISTRICT COURT)
SOUTHERN DISTRICT OF NEW YORK)

I, ERICA FIELD, RPR, Stenographic Court
Reporter, certify that I was authorized to
and did stenographically report the
deposition of LYNNE FREEMAN, pages 1 through
355; that a review of the transcript was not
requested; and that the transcript is a true
and complete record of my stenographic notes.

I further certify that I am not a
relative, employee, attorney, or counsel of
any of the parties, nor am I a relative or
employee of any of the parties' attorney or
counsel connected with the action, nor am I
financially interested in the action.

DATED this 27th day of March, 2023.



Erica Field, RPR